

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA	:	3:18-CR-00097
	:	
v.	:	(Judge Mariani)
	:	
ROSS ROGGIO	:	(Electronically Filed)

MOTION TO WITHDRAW AS COUNSEL

AND NOW comes Leo A. Latella, Assistant Federal Public Defender, attorney for Ross Roggio, and moves this Honorable Court to enter an Order granting the within Motion to Withdraw as Counsel. In support thereof, it is averred as follows:

1. On March 20, 2018, Ross Roggio was charged in an Indictment with conspiracy to commit an offense against the United States, in violation of 18 U.S.C. § 371; violations of the Arms Export Control Act, 22 U.S.C. § 2778(b) and (c); and the International Emergency Powers Act, 50 U.S.C. §§ 1702 and 1705(c); smuggling goods from the United States, in violation of 18 U.S.C. §§ 554 and 2; wire fraud, in violation of 18 U.S.C. § 1343; and money laundering, in violation of 18 U.S.C. §§ 1956(a)(2)(A) and 2.

2. On March 23, 2018, Mr. Roggio appeared before Magistrate Judge Karoline Mehalchick for an initial appearance and arraignment. The Federal Public Defender was appointed to represent Mr. Roggio.

3. A conflict of interest has arisen in this matter and the Federal Public Defender's Office is unable to continue to represent Mr. Roggio due to the conflict.

4. For the above-stated reason, the undersigned respectfully requests that he be allowed to withdraw as counsel for Mr. Roggio.

5. It is further requested that Gino A. Bartolai, Jr., a member of the Criminal Justice Act Panel, be appointed to represent Mr. Roggio.

WHEREFORE, Leo A. Latella, Assistant Federal Public Defender, respectfully requests that this Honorable Court issue an Order removing him and the Office of the Federal Public Defender for the Middle District of Pennsylvania as counsel of record for Ross Roggio and appoint Gino A. Bartolai, Jr., a member of the Criminal Justice Act Panel to represent Mr. Roggio.

Respectfully submitted,

Date: April 1, 2019

s/Leo A. Latella

Leo A. Latella

Assistant Federal Public Defender

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CERTIFICATE OF SERVICE

I, Leo A. Latella, Assistant Federal Public Defender, do hereby certify that this document, the foregoing **Motion to Withdraw as Counsel**, filed through the ECF System, will be electronically sent to the registered Participants, as identified on the Notice of Electronic Filing, including the following:

Todd K. Hinkley
Assistant United States Attorney

and by placing same in the United States mail, first class, postage prepaid, at Scranton, Pennsylvania addressed to the following:

Mr. Ross Roggio

Date: April 1, 2019

s/Leo A. Latella _____
Leo A. Latella
Assistant Federal Public Defender